

EXHIBIT 20

Morgan, Patricia Kay

August 27, 2007

Tampa, FL

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IN THE CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA

- - - - - - - - - - - - - - -x
STATE OF ALABAMA, :
Plaintiff, :
vs. : Case No.: CV-05-219
ABBOTT LABORATORIES, INC., : Judge Charles Price
et al. :
Defendants. :
- - - - - - - - - - - - - - -x

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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In re: PHARMACEUTICAL :
INDUSTRY AVERAGE WHOLESALE : MDL No. 1456
PRICE LITIGATION : Civil Action No.
: 01-12257-PBS
THIS DOCUMENT RELATES TO: :
:
ALL ACTIONS :
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DEPOSITION OF PATRICIA KAY MORGAN

August 27, 2007

Henderson Legal Services
202-220-4158

Morgan, Patricia Kay

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| <p>1 EXAMINATION
 2 BY MR. EDWARDS:
 3 Q. By my watch it's around 1:15. Thank you
 4 for appearing today, Ms. Morgan. I'm Steve
 5 Edwards. I represent Bristol-Myers Squibb in the
 6 case by the State of Alabama against a number of
 7 pharmaceutical manufacturers and many other cases
 8 as to which your deposition has been noticed here
 9 today.</p> <p>10 Why don't we start by asking you to state your
 11 name and address for the record.</p> <p>12 A. Patricia Kay Morgan, 700 South Harbour
 13 Island Boulevard, Tampa, Florida 33602.</p> <p>14 Q. And is it correct that you're here today
 15 pursuant to a subpoena?</p> <p>16 A. That's correct.</p> <p>17 Q. And is it also correct that you objected
 18 to the subpoena?</p> <p>19 A. That's correct.</p> <p>20 Q. So you're not here today voluntarily;
 21 you're here because a court ordered you to appear,
 22 correct?</p> <p>23 A. That's correct.</p> | <p style="text-align: right;">Page 28</p> <p>1 Q. First DataBank, as I understand it, is a
 2 company that reports product and pricing
 3 information on pharmaceutical products; is that
 4 correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. And First DataBank is owned by
 7 Hearst Corporation, is that correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And Hearst Corporation is a public
 10 company; it's not owned by any of the
 11 pharmaceutical manufacturers? Is that true?</p> <p>12 A. I don't believe it's a public company.</p> <p>13 Q. Okay. But it's not owned by any
 14 pharmaceutical manufacturers; is that true?</p> <p>15 A. That's true.</p> <p>16 Q. It's independent of the pharmaceutical
 17 manufacturers; is that fair?</p> <p>18 A. That's true.</p> <p>19 Q. Now, as I understand it, at First
 20 DataBank you were the manager of editorial
 21 services?</p> <p>22 A. That's correct.</p> <p>23 Q. And as such, you were responsible for</p> |
| <p style="text-align: right;">Page 27</p> <p>1 Q. And you're represented by counsel here
 2 today; is that correct?</p> <p>3 A. That's correct.</p> <p>4 Q. And that's Mr. Kern?</p> <p>5 A. Correct.</p> <p>6 Q. And he is also counsel for First
 7 DataBank; is that your understanding?</p> <p>8 A. That's correct.</p> <p>9 Q. And First DataBank is your former
 10 employer; is that correct?</p> <p>11 A. That's correct.</p> <p>12 Q. As I understand it, you graduated from
 13 college in about 1975; is that correct?</p> <p>14 A. That's correct.</p> <p>15 Q. And you have a pharmacy degree?</p> <p>16 A. That's correct.</p> <p>17 Q. And then after college you worked at
 18 Abbott Labs from 1975 to sometime in 1999; is that
 19 correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And then you worked at First DataBank
 22 from 1999 till sometime in 2005?</p> <p>23 A. That's correct.</p> | <p style="text-align: right;">Page 29</p> <p>1 populating the drug database; is that correct?</p> <p>2 A. As far as the product and the pricing
 3 information.</p> <p>4 Q. And the pricing information that appeared
 5 in that database included average wholesale prices
 6 or AWPs; correct?</p> <p>7 A. We called it Blue Book AWP. But yes,
 8 there was that field.</p> <p>9 Q. And there were also wholesale net prices
 10 or wholesale acquisition costs also known as WAC?</p> <p>11 A. That's correct.</p> <p>12 MR. EDWARDS: That's W-A-C for the reporter.</p> <p>13 MR. KERN: Steve, let just interpose that --</p> <p>14 remind all the parties that the protective order</p> <p>15 does prohibit parties from asking about subject</p> <p>16 matter areas that were covered in prior depositions</p> <p>17 except as necessary to reasonably lay foundation,</p> <p>18 which I think you're doing.</p> <p>19 MR. EDWARDS: Which I'm trying to do.</p> <p>20 MR. KERN: Okay.</p> <p>21 BY MR. EDWARDS:</p> <p>22 Q. And as I understand it, you have</p> <p>23 testified about your work at First DataBank before;</p> |

8 (Pages 26 to 29)

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